

1 Matthew I. Knepper, Esq.
Nevada Bar No. 12796
2 Miles N. Clark, Esq.
Nevada Bar No. 13848
3 KNEPPER & CLARK LLC
5510 So. Fort Apache Rd, Suite 30
4 Las Vegas, NV 89148
Phone: (702) 856-7430
5 Fax: (702) 447-8048
Email: matthew.knepper@knepperclark.com
6 Email: miles.clark@knepperclark.com

7
8 George H. Haines, Esq.
Nevada Bar No. 9411
9 FREEDOM LAW FIRM
8985 S. Eastern Avenue, Suite 350
10 Las Vegas, NV 89123
Phone: (702) 880-5554, Ext.222
11 EFax: (702) 967-6666
Email: ghaines@freedomlegalteam.com
12

13 *Counsel for Plaintiff*

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 DANIEL ZEEVI,

17 Plaintiff,

18 v.

19 CITIBANK, N.A.,

20 Defendant.

Case No. 2:19-cv-02206-GMN-BNW

STIPULATION TO STAY DISCOVERY
[FIRST REQUEST]

Complaint filed: December 23, 2019

21 Plaintiff Daniel Zeevi ("Plaintiff"), by and through his counsel of record, and Defendant
22 Citibank, N.A. ("Citi") have agreed and stipulated to the following:
23

- 24 1. On December 23, 2019, the Plaintiff filed his complaint [ECF Dkt. 1].
25 2. On May 5, 2020, Citi filed a Motion to Compel Arbitration [ECF Dkt. 18] and briefing was
26 completed on May 26, 2020.
27

28 53804812;1

3. The Parties stipulate to stay discovery pending the outcome of Citi's Motion to Compel Arbitration. As a result, both Plaintiff and Citi hereby request this Court to stay discovery pending the outcome of Citi's Motion to Compel Arbitration.

4. This stipulation is made in good faith, is not interposed for delay, and is not filed for an improper purpose.

IT IS SO STIPULATED.

DATED July 10, 2020

KNEPPER & CLARK LLC

/s/ Miles N. Clark

Matthew I. Knepper, Esq., SBN 12796
Miles N. Clark, Esq., SBN 13848
5510 So. Fort Apache Rd, Suite 30
Las Vegas, NV 89148
Email: matthew.knepper@knepperclark.com
Email: miles.clark@knepperclark.com

FREEDOM LAW FIRM

George H. Haines, Esq., SBN 9411
8985 S. Eastern Avenue, Suite 350
Las Vegas, NV 89123
Email: ghaines@freedomlegalteam.com

Counsel for Plaintiff

AKERMAN LLP

/s/ Jamie K. Combs

Ariel E. Stern Esq., SBN 8276
Jamie K. Combs, Esq., SBN 13088
1635 Village Center Circle, Suite 200
Las Vegas, NV 89134
Email: ariel.stern@akerman.com
Email: jamie.combs@akerman.com

*Counsel for Defendant
Citibank, N.A.*

ORDER GRANTING STIPULATION TO STAY DISCOVERY

IT IS SO ORDERED.

IT IS FURTHER ORDERED that the parties must file a joint status report 10 days following a decision on the pending motion to compel arbitration.



UNITED STATES DISTRICT COURT JUDGE

DATED July 13, 2020

Zeevi v. Citibank
Case No.: 2:19-cv-02206-GMN-BNW

53804812;1